WRIGHT STANISH & WINCKLER
Karen C. Winckler
Bar No. 2809
200 South 4th Street Ste 701
Las Vegas, Nv. 89101
Counsel for Alan Rodrigues

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,

Plaintiff,

VS.

ALAN L. RODRIGUES, WESTON J. COOLIDGE, and JOSEPH PROKOP,

Defendants.

Case No.: 2:09-cr-022-MMD-GWF

UNOPPOSED MOTION TO ORDER THE BANKRUPTCY TRUSTEE TO PROVIDE ACCESS TO MATERIALS SEIZED FROM NADN OFFICES

Karen C. Winckler, counsel for ALAN L. RODRIGUES, Assistant Federal Public Defender Richard Boulware, counsel for WESTON J. COOLIDGE; and Travis Shetler, counsel for JOSEPH PROKOP, move this Honorable Court to Order the Bankruptcy Trustee William Leonard to provide access to materials seized from NADN offices and to allow the defendants to assist counsel by joining with counsel and/or paralegals at the Valley View storage unit which contains the seized evidence and is controlled by Bankruptcy Trustee William Leonard.

The Government has no objection to this motion and has agreed to work with the defendants to retrieve the seized office evidence.

This motion is made to allow counsel to review and copy, as needed, the seized NADN materials controlled by the Bankruptcy Trustee. To facilitate the review of the contents of the seized evidence, we request that the owner of NADN [Coolidge], the

1	office manager of NADN [Rodrigues] and a sales manager of the product [Prokop] to be
2	allowed to participate in the review of their stored office documents at the storage unit.
3	This will be a saving of both time and money for the defense by using the persons who
4	know how to quickly identify the relevant materials for their defense.
5	DATED: July 11, 2012
6	RENE VALLADARES WRIGHT STANISH & WINCKLER Federal Public Defender
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8	By: /s/ By: /s/ KAREN C. WINCKLER, ESQ.
9	Assistant Federal Public Defender Counsel for RODRIGUÉS Counsel for Defendant COOLIDGE
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	By:/s/ TRAVIS SHETLER
2	Counsel for Defendant Prokop
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Counsel for Alan Rodrigues